

Sarah Ng

From: Anthony Tavella on behalf of DPE PS ePlanning Exhibitions Mailbox
Sent: Friday, 9 October 2020 11:04 AM
To: DPE PS Biodiversity Mailbox
Subject: FW: Webform submission from: Draft Cumberland Plain Conservation Plan
Attachments: 20204---let2_20201008.pdf

From: noreply@feedback.planningportal.nsw.gov.au <noreply@feedback.planningportal.nsw.gov.au>
Sent: Thursday, 8 October 2020 5:52 PM
To: DPE PS ePlanning Exhibitions Mailbox <eplanning.exhibitions@planning.nsw.gov.au>
Subject: Webform submission from: Draft Cumberland Plain Conservation Plan

Submitted on Thu, 08/10/2020 - 17:51
Submitted by: Anonymous
Submitted values are:
Submission Type: I am making a personal submission
First Name: [REDACTED]
Last Name: [REDACTED]
Name Withheld: Yes
Email: [REDACTED]
Suburb/Town & Postcode: 2745
Submission file:
[20204---let2_20201008.pdf](#)

Submission: 9 October 2020 Department of Planning, Industry and Environment Green and Resilient Places Division Locked Bag 5022 Parramatta NSW 2124 Email: biodiversity@planning.nsw.gov.au Attention: Elizabeth Irwin From: [REDACTED]
RE: PLANNING SUBMISSION TO DRAFT CUMBERLAND PLAIN CONSERVATION PLAN, AS IT RELATES TO THE PROPERTY - [REDACTED], Wallacia Dear Ms Irwin, We are the owners of [REDACTED] and we are writing this submission in relation to the draft Cumberland Plain Conservation Plan ('the Plan'). Our land covers an area of approximately 40ha as shown in the attached Ecology Study attached at Appendix 1 and currently zoned RU1 – Primary Production. We have been living on the property since 27 April 1987, the last 33 years, because we love the area and value the nature, landscape and its surrounds. However, whilst we love our home, we have been intensively using our property for agriculture and grazing throughout that time. When we first purchased the property, we leased the adjacent property and ran a dairy operation. The property, [REDACTED] grazed approximately 140 dry cattle across all of the property for approximately 3 years. Since selling the dairy, we have been running approx. 30 cattle for breeding and fattening in sections of the property as well as active agricultural management constant pasture improvement, irrigation and fertilization for cropping including oats, rye grass, clovers and mixed grasses. The land is largely cleared and agricultural in nature. For these reasons, we submit that the mapping carried out by the Department to classify our land as "Strategic Conservation" is inaccurate and unjustified. This is supported by the Ecology Report we commissioned for the site at significant expense by Cumberland Ecology. As you can see in that report, field surveys were conducted by an ecologist and botanist from Cumberland Ecology on 24 September 2020. This included a site overview, and detailed discussion of past and present land uses and management. The report also shows photographs to provide the Department with a greater understanding of the conditions and constraints in relation to biodiversity. The report concludes that "the feasibility for conservation is significantly reduced when the current farming land uses are considered. The natural resilience of the broad areas of woodland and grassland across the subject site are not evident, which would reduce the value of this land for conservation in the future. There was an evident lack of derived native grasslands, and also a lack of eucalypt regeneration, even in the woodland patches." Given our site has been extensively farmed, and the condition and extent of native vegetation reflects this, the overlay of strategic conservation needs to at least be limited to focus on the specific riparian corridors and the retention of the very small patches of relevant trees, although acknowledging of the intended continuation of farming under its current zoning. Whilst we acknowledge that the Plan states that not all of the mapped strategic conservation area will in the future be established as conservation land, we do not believe it is fair to burden our land with that classification now without the Department undertaking a proper analysis or inspection. There are existing regulations and a framework already protecting the environment and controlling what we can do on our property so this overlay is redundant and unnecessary. The Department should not be allowed to place a new overlay upon our land without carrying out current mapping and ground truthing of the area. More importantly, we were under the impression that any Conservation Zoning is not allowed under the Airport Safety Guidelines which specifically prohibits conservation areas within close proximity of an airport. In conclusion, we do not object to the Plan in principle, we appreciate the Department trying to protect native vegetation to preserve this for future generations. We are concerned that against our land, places an additional burden for us which is not only inaccurate and unjustified, but it has also been done without any inspection of our property to confirm what is there. The attached report highlights this. My husband Dario would love to give you a tour – we have been on the land everyday for the last 33 years and we are very proud of what we have accomplished. We hope that you can understand our concerns. If you have any other questions or need further information, please

do not hesitate to contact us. Yours faithfully, [REDACTED]

URL: <https://pp.planningportal.nsw.gov.au/draftplans/exhibition/draft-cumberland-plain-conservation-plan>

8 October 2020

██████████
Wallacia NSW 2745

By email to: ██████████

Draft Cumberland Plain Conservation Plan: Supporting Ecological Assessment for submission for ██████████ Wallacia

Dear Bernadette and Dario,

This letter presents our broad-scale ecological assessment of the biodiversity values of the property located at ██████████ Wallacia (referred to as the subject site) to support a submission to the NSW Department of Planning, Infrastructure and Environment (DPIE), regarding the Draft Cumberland Plain Conservation Plan (“the DCPCP”). The DCPCP has implications for any future development of the subject site due to the mapping of areas as strategic conservation areas.

The field surveys conducted to date confirmed the presence of the threatened ecological communities Cumberland Plain Woodland (CPW) and River-flat Eucalypt Forest (RFEF) within the subject site. The condition of CPW and RFEF varies across the subject site, but generally reflects the farming land use of the subject site, including ongoing cultivation, irrigation and pasture improvement, which reduces the natural resilience as conservation lands.

Although some of the areas mapped for strategic conservation do contain biodiversity values, notably the threatened ecological communities CPW and RFEF, the mapping has overestimated the area and biodiversity value of the mapped land for strategic conservation. The mapping has not taken into consideration the current condition of woodland and grasslands present, which have been actively farmed by the current owner for more than 30 years.

The mapping of the entire subject site as Strategic Conservation Areas is therefore not appropriate, and should be reduced to riparian corridors, and patches of woodland, to reflect the land uses and their value for biodiversity.

Our detailed assessment to support the submission to DPIE is provided in **Appendix A** to this letter. Supporting figures are attached at the end of this document.

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ABN 14 106 144 647
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If you have any queries or require any further information, please do not hesitate to contact me at our Sydney office on [REDACTED]

Yours sincerely

[REDACTED]

[REDACTED]

Senior Project Manager/Ecologist

[REDACTED]

APPENDIX A :

Draft Cumberland Plain
Conservation Plan:
Ecological assessment of
[REDACTED] [REDACTED] [REDACTED]
Wallacia

A.1. Introduction

This submission has been prepared for Bernadette and [REDACTED] (the client), to provide ecological advice regarding the mapping of ecologically significant land that is located at Lot [REDACTED] otherwise known as [REDACTED] Wallacia (hereafter referred to as the 'subject site').

The subject site is located within the suburb of Wallacia in the Liverpool Council Local Government Area and covers an area of approximately 40 ha, as shown in **Figure 1**. The subject site is currently zoned RU1 – Primary Production and is primarily composed of cleared land, which has been used for agricultural grazing purposes. A long history of farming practices, including pasture improvement, irrigation, and cropping has existed on the subject site, during the ownership by the [REDACTED] family, over the last 30 years. However, areas of remnant native vegetation as well as a number of mapped watercourses are also present within the subject site.

A.2. Draft Cumberland Plain Conservation Plan

A.2.1. Background

The NSW Government has identified four areas for urban growth and other development (referred to as 'nominated areas') and a series of transport corridors within and outside the nominated areas to support the future growth of Western Sydney. The nominated areas include:

- Greater Macarthur Growth Area;
- Greater Penrith to Eastern Creek Investigation Area;
- Western Sydney Aerotropolis; and
- Wilton Growth Area.

The key infrastructure/transport corridors include:

- Metro Rail future extension to Macarthur (excluding areas within the South West Growth Area);
- M7/Ropes Crossing Link Road;
- Outer Sydney Orbital between Box Hill and the Hume Motorway near Menangle; and
- Western Sydney Freight Line corridor.

The nominated areas program is administered by the NSW Department of Planning, Industry and Environment (DPIE) while the transport corridors program is administered by Transport for NSW (TfNSW), who are a major project partner.

As part of the biodiversity approvals required for the development of the nominated areas, DPIE has prepared the Draft Cumberland Plain Conservation Plan (DCPCP) to provide long-term certainty for biodiversity and development in Western Sydney. The DCPCP will support two separate statutory approvals processes under State and Commonwealth laws that are required to address the impacts of the proposed development on biodiversity values. These include:

- Strategic biodiversity certification under Part 8 of the *Biodiversity Conservation Act 2016* (BC Act); and
- Strategic assessment under Part 10 of the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

The aim of the DCPCP is to support the delivery of infrastructure, housing and jobs for Western Sydney in a planned and strategic way that also protects and maintains key biodiversity values of Western Sydney. The DCPCP includes a conservation program of commitments and actions that seeks to improve ecological function and resilience in the Cumberland Plain and provide an enduring conservation legacy for Western Sydney. A structured decision-making process was based around four decision making criteria across environmental, social and economic themes. The criteria were:

- Maximise conservation of biodiversity
- Minimise the costs of delivering the biodiversity outcome
- Ensure the biodiversity outcome is feasible
- Maximise public amenity

Overall, the DCPCP identifies the following categories of land within the nominated areas:

- Certified Urban Capable: development can occur without further biodiversity assessments, subject to development approval in accordance with precinct plans;
- Non-certified – Western Sydney Aerotropolis: 1 in 100 year flood affected land and other vegetated land within the Aerotropolis SEPP area;
- Non-certified – avoided for Biodiversity Purposes: land to be protected for its important environmental value and to be rezoned E2 Environmental Conservation.
- Non-certified – avoided for other purposes: land that has riparian corridors, steep slopes or other constraints such as flood risk and is to be rezoned E2 Environmental Conservation
- Excluded: land is excluded from the strategic certification as it is either already developed for urban use, is already subject to environmental protection or specific zoning, or is subject to a separate biodiversity approval process.

In addition, the DCPCP also identifies the major transport corridors and strategic conservation areas outside of the nominated areas. These strategic conservation areas include lands with high-value biodiversity, as well as areas with important connectivity or potential for ecological restoration.

The strategic conservation area is to be used to identify and prioritise suitable conservation lands as offsets for biodiversity impacts over the life of the Plan. Suitable areas may be protected as a future reserve or biodiversity stewardship site or enhanced through an ecological restoration project to deliver the Plan's offset targets for affected native vegetation communities.

Not all of the mapped strategic conservation area will be established as conservation land under the Plan and identification of suitable conservation lands from within the strategic conservation area will continue over the life of the Plan to ensure that potential sites are appropriate, can be implemented and are based on the best available information and data.

A.2.2. Mapping of the Subject Site and Surrounds

The subject site does not lie within the boundaries of any of the nominated areas and therefore is not subject to any of the land categories for nominated areas.

The majority of the subject site, with the exception of tracks and completely cleared areas, is mapped as part of the Strategic Conservation Areas (SCAs), as shown in **Figure 2**.

The surrounding lands in each direction are also predominantly mapped as SCAs, with the exception of largely cleared areas.

It is understood that this mapping is based on the perceived ecological values of the subject site with large portions being mapped as Cumberland Plain Woodland, Moist Shale Woodlands and Shale Sandstone Transition Forest, as shown in **Figure 3**. All three of these vegetation communities are listed as threatened ecological communities (TECs) under the *NSW Biodiversity Conservation Act 2016* (BC Act) and/or Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). Furthermore, the subject site contains a marked watercourse as shown in **Figure 1**.

A.3. Methodology

The proposed mapping/zoning under the DCPCP has implications for the future development of the subject site due to the Strategic Conservation Area (SCA) mapping.

Suitability/accuracy of mapping was assessed to determine the suitability of the proposed mapping/zoning with due consideration to on-ground conditions, future land uses and objectives of the DCPCP. The methodology for this assessment has been conducted as follows:

A.3.1. Desktop assessments

Desktop assessments involved a detailed review of the Draft Cumberland Plain Conservation Plan and supporting documents, as well as the local vegetation mapping, and threatened species information for the subject site. The desktop assessment included review of the following resources:

- Detailed Review of DCPCP exhibition documents, as publicly available;
- Vegetation Mapping of the Cumberland Plain (OEH 2013);
- Vegetation Information System (VIS) (EES 2020b); and
- BioNet (EES 2020a).

A.3.2. Field Surveys

Field surveys were conducted by an ecologist and botanist from Cumberland Ecology on 24 September 2020. Survey locations are shown in **Figure 4**. This included a site overview, and detailed discussion of past and present land uses and management with the owner, who has farmed the subject site for 30 years. Photographs and notes were taken during the site overview inspection, to allow for a thorough understanding of the conditions and constraints in relation to biodiversity.

Following the site overview, flora and fauna surveys were conducted, as described below.

A.3.2.1. Flora Surveys

Flora surveys were conducted to verify existing vegetation mapping, with particular reference to TECs listed under the BC Act and/or EPBC Act. Each patch of vegetation within the subject site was ground-truthed and the plant species recorded. The vegetation survey consisted of random meander transects to compile detailed lists of plant species present within each plant community type and vegetation patch.

BAM plots were conducted to support the remapping of the subject site. A total of four (4) BAM plots were completed within each vegetation community. The results of the BAM plot data was analysed to determine the appropriate Plant Community Type (PCT) and association with Threatened Ecological Communities (TECs), as well as the general values for biodiversity of the site.

A.3.3. Fauna Habitat Assessments

Fauna habitat assessments were conducted as part of the floristic surveys, and included recording key habitat resources for threatened species, such as the presence of hollows, logs, dense understorey vegetation, flowering and fruiting plants, bush rock and watercourses.

A.4. Key Findings

A.4.1. Vegetation of the Subject Site

The vegetation of the subject site varies in condition, based on the timing of most recent farming practices, including pasture improvement, cropping, irrigation and grazing. Two of the paddocks have recently been sown with oats and will be harvested this spring. Cattle grazing is rotated but appears to have been recently concentrated in the western half of the subject site. Such disturbances have resulted in a mosaic of native vegetation, in various condition states, although remnant trees occur throughout.

A.4.1.1. Plant Community Types

The broad-scale mapping for the Cumberland Plain (OEH 2013) was found to be an inaccurate representation of the vegetation of the subject land and vegetation was remapped based on field survey data.

Remapping and identification of the PCTs occurring within the subject land was guided by the results of the surveys undertaken by Cumberland Ecology. The data collected during surveys of the subject land and surrounds was analysed in conjunction with a review of the PCTs held within the BioNet Vegetation Classification database and information presented. In selecting PCTs, consideration was given to the following:

- Occurrence within the Cumberland Plains IBRA subregion;

- Vegetation formation;
- Alignment with TECs;
- Landscape position; and
- Upper, mid and ground strata species.

The analysis determined that the native vegetation within the subject land aligned with two PCTs held within the BioNet Vegetation Classification database. **Table 1** provides a summary of the PCT identified within the subject land. The distribution of the PCTs within the subject land is shown in **Figure 5**. Descriptions of the PCT is provided in the sections below.

Table 1 Vegetation and Land Features of the Subject Site

Vegetation / Land Feature	Area_(ha)
PCT 835: Cumberland riverflat forest - Moderate	1.99
PCT 850: Cumberland shale hills woodland - Low	1.85
PCT 850: Cumberland shale hills woodland - Low/Moderate	7.77
Exotic/Planted Vegetation	1.78
Dams	1.67
Exotic Dominated Grassland	24.92
Cleared Land	0.31
Total	40.29

A.i. PCT 850 - Cumberland Shale Hills Woodland

Cumberland Shale Hills Woodland occurs across the subject site, as small patches where clusters of paddock trees occur. The greatest concentration of native species are present in these patches.

Paddock trees are present throughout the subject site and are represented primarily by Grey Box (*Eucalyptus moluccana*) and Forest Red Gum (*Eucalyptus tereticornis*). The paddock trees are remnant of the original Cumberland Plain Woodland critically endangered community, as listed under the BC Act and EPBC Act.

Across the subject site, Cumberland Shale Hills Woodland occurs as two general condition categories, depending on the timing of most recent agricultural practices (such as pasture improvement), and the density of canopy trees, being in low, or moderate to low condition, as described below:

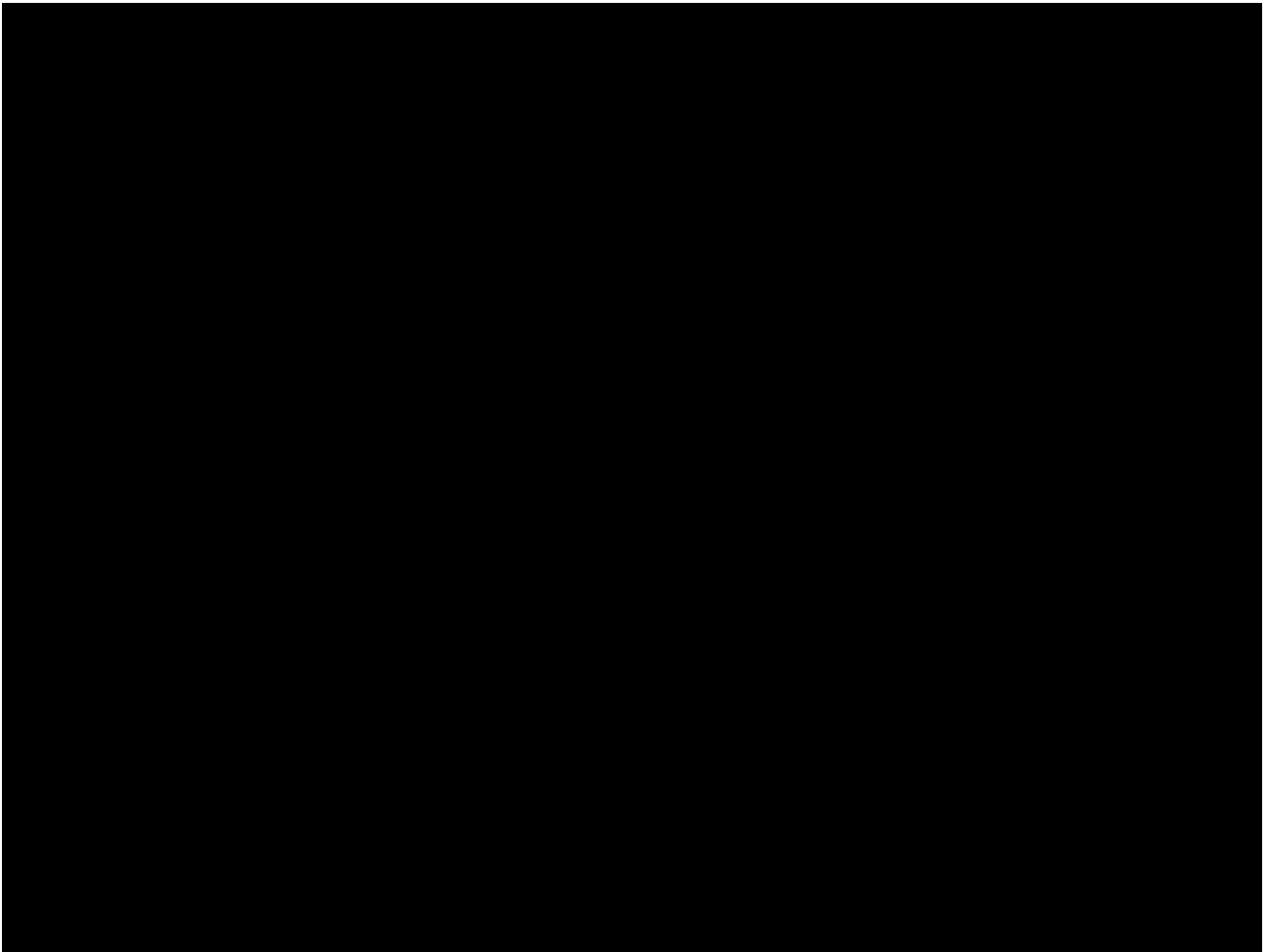
A.a. Low to Moderate Condition

The canopy of the most intact CPW was very open and dominated by *Eucalyptus tereticornis* and *E. moluccana*. The midstorey was absent with little to no eucalypt regeneration. A very sparse to moderate shrub layer was present in some of the larger patches and dominated by *Bursaria spinosa* (Blackthorn) and *Atriplex semibaccata* (Creeping Saltbush). The groundcover was dominated by grasses, including natives; *Aristida ramosa* var. *speciosa* (Purple Wire Grass) and *Microlaena stipoides* (Weeping Grass) and exotics; *Lolium perenne* (Perennial

Ryegrass) and *Paspalum dilatatum* (Paspalum), and a low diversity of herbs, including hardy natives; *Dichondra repens* (Kidney Weed), *Einadia trigonos* (Fishweed) and *Brunoniella australis* (Blue Trumpet), and exotics; *Senecio madagascariensis* (Fireweed), *Plantago lanceolata* (Lamb's Tongues) and *Solanum sisymbriifolium*.

An example of Low-moderate condition Cumberland Shale Hills Woodland is shown in **Photograph 1**.

Photograph 1 Cumberland Shale Hills Woodland in Low – Moderate Condition on the Subject Site



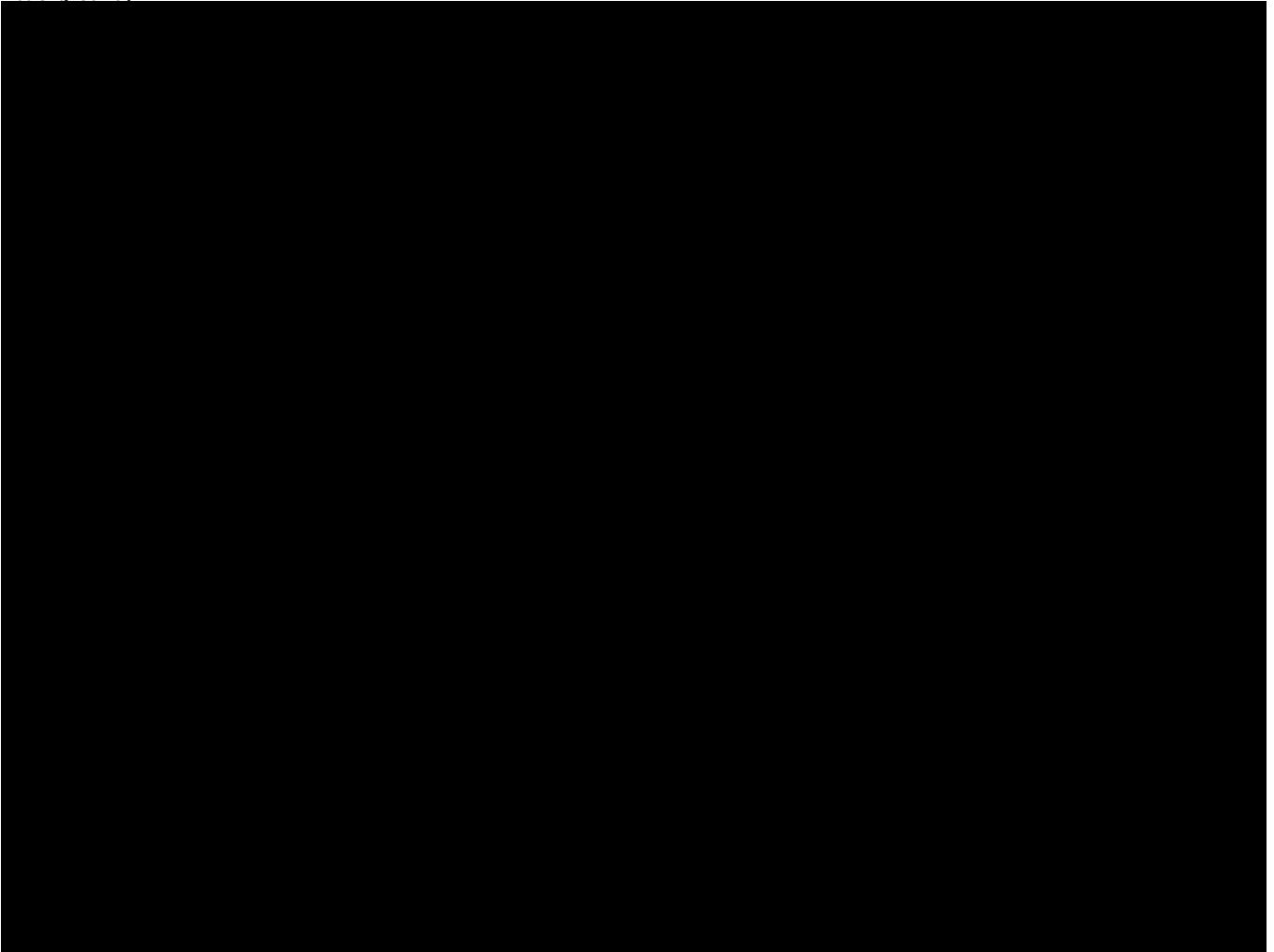
A.b. Low Condition

A very low condition variant of CPW was recorded in areas with a predominantly exotic grass (or pasture) and herb understorey in the areas of paddock trees. In consideration of the Final Determination for Cumberland Plain Woodland, these broad areas technically conform to the listing, and are therefore represented as a low condition class of the community. Based on the topography and location of the subject site, the CPW present is considered to conform to PCT 850 – Cumberland Shale Hills Woodland – Low Condition.

The vegetation consists of a canopy of *E. tereticornis* and *E. moluccana*, with an exotic understorey dominated by the pasture species; *Avena sativa* (Oats), with some herbs present in low abundance, dominated by exotics including; *Trifolium resupinatum* (Shaftal Clover), *Plantago lanceolata*, and *Sida rhombifolia* (Paddy's Lucerne), and few occurrences of the same herbs present in the low-moderate condition patches.

Where clusters of these paddock trees occur, small patches of the woodland are considered to represent low condition CPW, as shown in **Photograph 2**.

Photograph 2 CPW remnant paddock trees with an exotic pasture understorey (note the unharvested crop of oats in the background)



A.ii. PCT 835 Alluvial Woodland

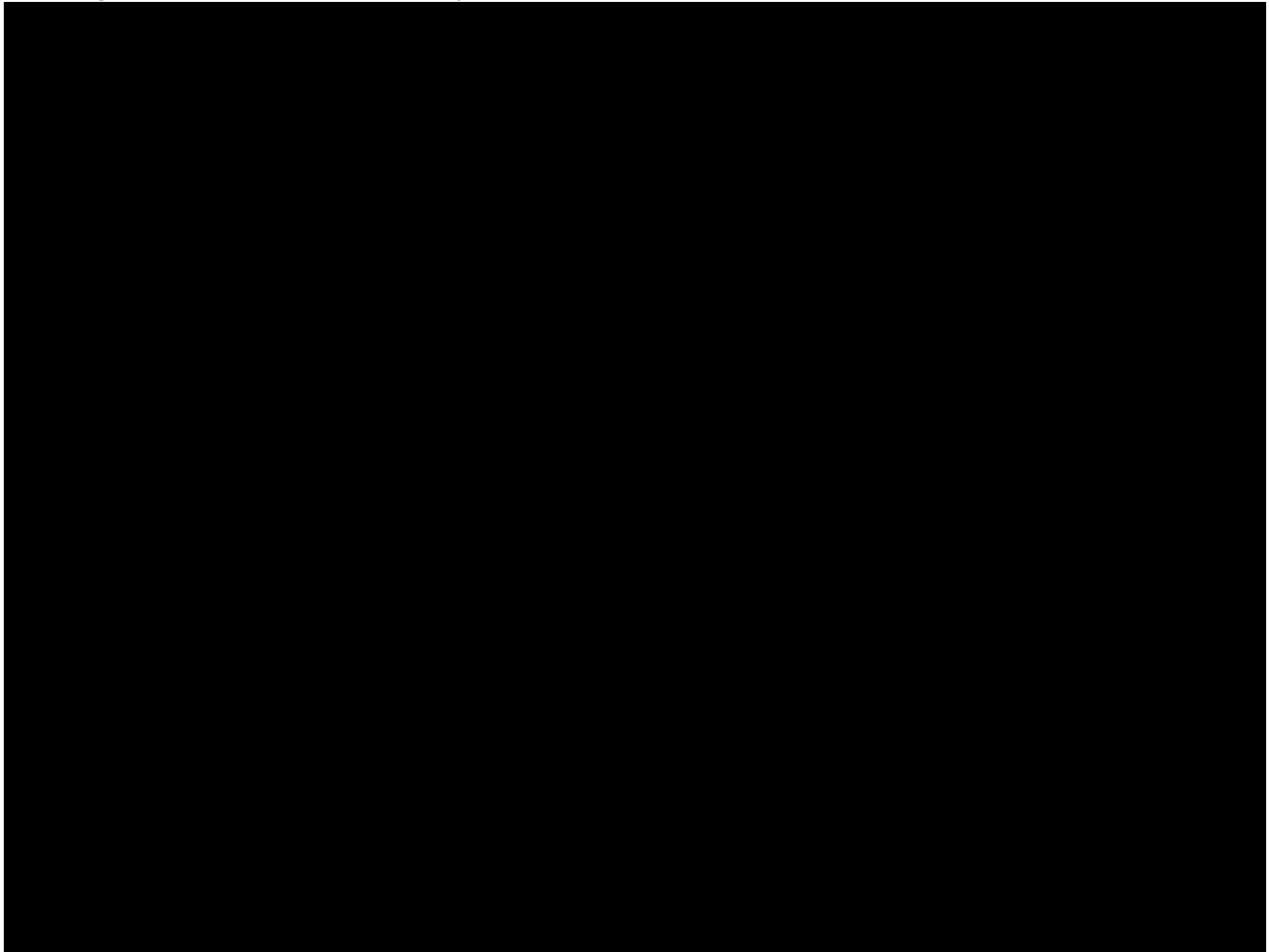
Alluvial Woodland occurs in the small gullies present on the eastern and western portions of the subject site, where mapped watercourses are present. This PCT is consistent with River-flat Eucalypt Forest endangered ecological community, as listed under the BC Act. As with the CPW, this community occurs in a degraded and simplified form, due to past and current land uses for farming, although regeneration of a midstorey and shrubby understorey provide a forest structure. There was evidence of sandstone outcropping, although sandstone associated species were absent, and hence it is assumed that this is from erosion of the shale capping in the gullies, exposing some of the underlying sandstone rock.

The canopy is dominated exclusively by *Eucalyptus tereticornis*, with a moderately dense large shrub layer of natives; *Bursaria spinosa* and *Acacia implexa* (Hickory Wattle), and exotics; *Ligustrum sinense* (Small-leaved

Privet) and *Olea europaea* (Common Olive). The groundcover was similar to that of CPW, with a greater diversity of herbs, and the inclusion of some moisture tolerant species such as; *Geranium solanderi* (Native Geranium), *Centella asiatica* (Indian Pennywort) and *Sonchus oleraceus* (Common Sowthistle).

An example of Alluvial Woodland is shown in **Photograph 3**.

Photograph 3 Alluvial Woodland on the Subject Site

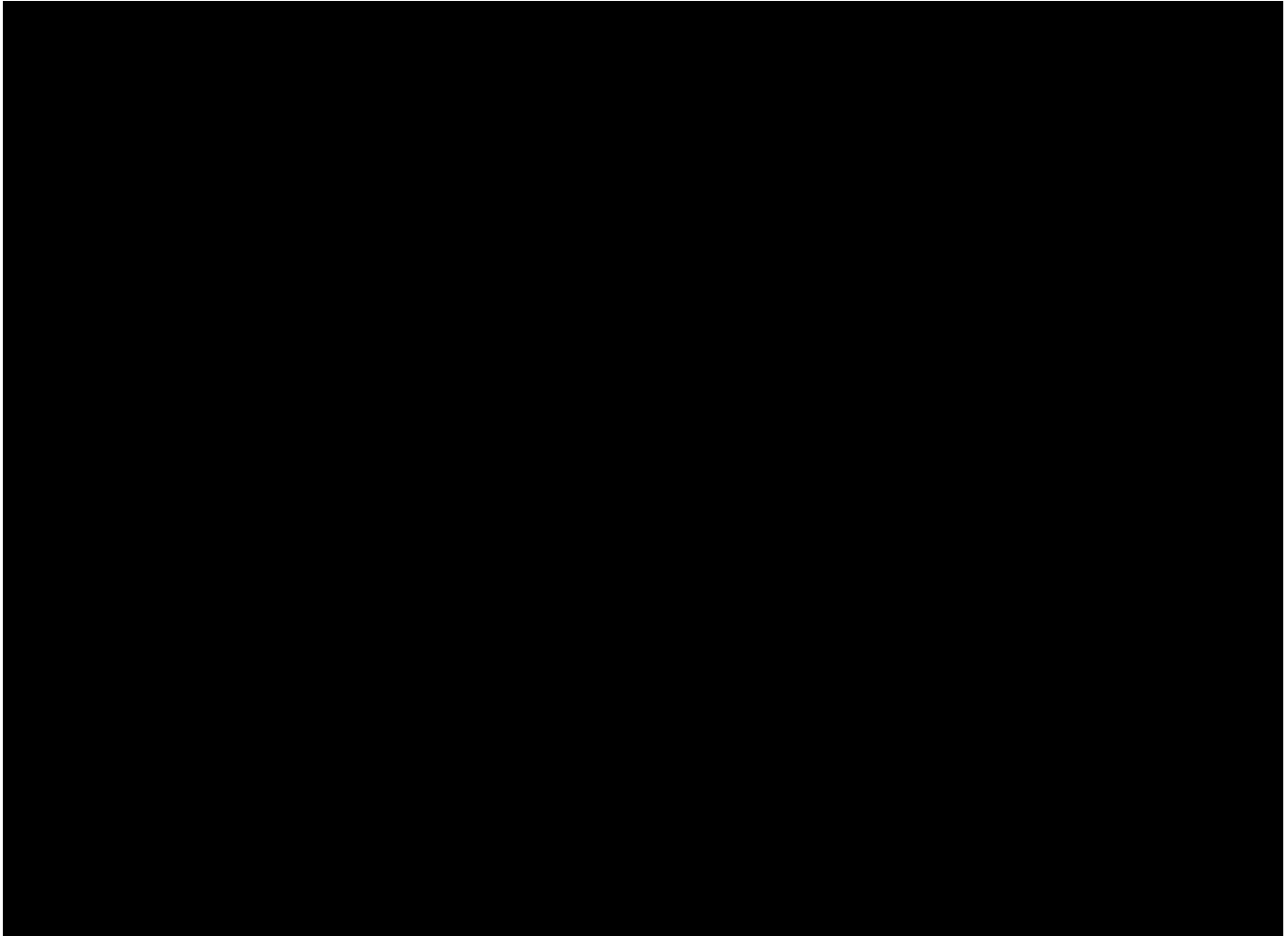


A.iii. Exotic Dominated Grassland / Pasture

Grassland conditions vary across the subject site, depending on the timing since recent agricultural practices, including pasture improvement, and cropping. Large areas have been sown with Oats in recent months. The remainder of the grasslands are dominated by exotic species; *Lolium perenne* (Rye Grass) and *Eleusine indica* (Crowsfoot Grass) and a low abundance of natives, including *Chloris ventricosa* (Tall Chloris), *Aristida ramosa* and *Microlaena stipoides* (Weeping Grass). The native grasses were most commonly recorded in areas closes to woodland patches, and where grazing is not currently occurring.

An example of Exotic Dominated Grassland present throughout much of the Subject Site is shown in **Photograph 4**.

Photograph 4 Exotic Dominated Grassland on the Subject Site. Note the pasture of Oats in the background.



A.iv. Exotic / Planted Vegetation

Exotic and planted vegetation occurs in association with the entry driveway and surrounding the dwellings. These plantings are predominantly *Photinia serratifolia* (Chinese Photinia).

A.4.2. Fauna Habitats

Fauna habitats present on the subject site are limited, due to the generally open nature of the vegetation, and small patch sizes of woodland, which provide insufficient cover and a diversity of species for foraging, for the majority of fauna. However, resources present include:

- Waterbodies, in the form of farm dams;
- Hollow-bearing trees;

- Dead wood and logs;
- Fruiting and flowering trees and shrubs;
- Grasslands; and
- Bush rock in some discrete areas

The habitats are suitable for a range of highly mobile species such as birds and bats, and large mammals including macropods. Common frog species would also be likely to occur, within the dams present on the subject site.

Of the species with potential to occur, several are listed as threatened under the BC Act and/or the EPBC Act including; the Grey-headed Flying-fox (*Pteropus poliocephalus*), Southern Myotis (also known as the Large-footed Myotis) (*Myotis macropus*), Eastern False Pipistrelle (*Falsistrellus tasmaniensis*), Greater Broad-nosed Bat (*Scoteanax rueppellii*), Eastern Coastal Free-tailed Bat (also known as the Eastern Freetail Bat) (*Micronomus norfolkensis*), Yellow-bellied Sheathtail-bat (*Saccolaimus flaviventris*) and Little Lorikeet (*Glossopsitta pusilla*). Other species with potential to occur include the Eastern Bent-winged Bat (*Miniopterus orianae oceanensis*) and Little Bent-winged bat (*Miniopterus australis*), although only as occasional foraging habitat, due to the lack of cave-roosting habitat onsite or close-by.

A.4.3. Watercourses within subject site

The desktop assessments of topographic maps and review of the ecological documentation prepared for the DCPCP indicate that the watercourses passing through the subject site are a 1st order and a 2nd order streams (as per the Strahler ranking).

Although the watercourses technically comprise between 1st and 2nd order streams based on presence of mapped watercourses on topographic maps, the onsite conditions are not representative of the relevant ranking of waterways. Past land uses and construction of farm dams have altered the historic landform and drainage channels. The onsite first order 'source' streams are largely absent with no existing bed/bank or channels and farm dams have largely altered drainage patterns to overland flows. At the time of the survey, no flow was observed in either of the mapped 2nd order watercourses.

A.4.4. Strategic Conservation Considerations

The field surveys have confirmed the presence of the TECs CPW and RFEF across the subject site with the best quality vegetation occurring on the upper slopes present in the north east and north west of the subject site. On a local level, the vegetation identified as 'Strategic Conservation Area' has high biodiversity conservation values due to the presence of TECs but only partly fits the DCPCP criteria for maximising conservation of high quality remnants (for low- moderate condition patches).

However, on a wider strategic/landscape level, the feasibility for conservation is significantly reduced when the current farming land uses are considered. The natural resilience of the broad areas of woodland and grassland across the subject site are not evident, which would reduce the value of this land for conservation in the future. There was an evident lack of derived native grasslands, and also a lack of eucalypt regeneration, even in the woodland patches.

The mapped extent of the patches of woodland is far smaller than those indicated by broadscale regional mapping (as shown in **Figure 3**), which has informed the Draft Cumberland Plain Conservation Plan and identification of Strategic Conservation Areas. The subject site has been extensively farmed, and the condition and extent of native vegetation reflects this. Strategic conservation of the subject site should focus on the establishment of riparian corridors, and retention of the small patches of CPW, although with acknowledgement of the intended continuation of farming under current zoning.

Under the DCPCP, landholders in the SCA who want to develop their land will still be able to submit development applications through the relevant development assessment pathway. Any impacts on ecology associated with these development applications will need to be assessed in accordance with the requirements of the BC Act and/or the EPBC Act, which include requirements to avoid and minimise impacts.

It is noted that the DCPCP proposes to introduce planning controls for the SCAs that will minimise impacts on areas with high biodiversity value that can deliver regional biodiversity outcomes. As part of this assessment process the consent authority will need to consider the region's biodiversity values when assessing development applications.

As assessments under the BC Act already require assessments at landscape levels as well as measures to avoid and minimise impacts on areas with high biodiversity value, the introduction of additional planning controls do not appear to significantly add any further ecological safeguards beyond that already provided by the BC Act.

A.5. Conclusion

The field surveys conducted to date confirmed the presence of the threatened ecological communities CPW and RFEF within the subject site. The condition of CPW and RFEF varies across the subject site, but generally reflects the farming land use of the subject site, including ongoing cultivation, irrigation and pasture improvement, which reduces the natural resilience as conservation lands.

The mapping of the entire subject site as Strategic Conservation Areas is therefore not appropriate, and should be reduced to riparian corridors, and patches of woodland, to reflect the land uses and their value for biodiversity.

A.6. References

- EES. 2020a. BioNet Atlas. Environment, Energy and Science.
- EES. 2020b. BioNet Vegetation Classification. Environment, Energy and Science.
- OEH. 2013. Remnant Vegetation Mapping of the Cumberland Plain. NSW.

FIGURES



